



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK/JAM/AFM
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 2, 2021

By USAFx

Zachary Margulis-Ohnuma
Law Office of Zachary Margulis-Ohnuma
c/o Sophia Lattanzio, Paralegal
[Home Address]
New York, NY 10032

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (S-1) (EK)

Dear Mr. Margulis-Ohnuma:

The government provides the following supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure.

First, the Internet Archive provided the government with another copy of the records it previously provided but re-exported them in pdf format. They also provided the government with one additional record. The foregoing records have been pre-marked as GX 1101 through GX 1105 and are enclosed, along with their certifications.

Second, Digital Ocean provided the government with another copy of account records that includes a column that the previous version did not contain. Accordingly, enclosed are revised version of GX 411 and GX 411A.

Third, the government has received updated translations of certain of the defendant's Skype and Jabber communications, which are enclosed and Bates-stamped ZHU007498 and ZHU007499.

Finally, earlier this week you requested additional information related to logs provided by Platform 4 and the witness testifying about those logs. Earlier today, the government received additional data from Platform 4 related to the logs, which is enclosed and Bates-stamped ZHU007500. This material is designated ATTORNEYS EYES ONLY and is subject to the protective order in this case. The government previously notified the defense, in letters dated January 27, 2020 and January 30, 2021, that a representative from

Platform 4 would testify regarding the logs and data from the company and that it expects this testimony to be fact testimony. The government does not object to providing you with additional materials related to the witness and will do so next week.

Please contact us if you have any questions or requests.

Very truly yours,

MARK J. LESKO
Acting United States Attorney

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Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)